

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

JANE DOE,

*Plaintiff,*

v.

OFFICE OF THE PUBLIC DEFENDER,  
ET AL.,

*Defendants.*

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No. 8:25-cv-717 PX

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PLAINTIFF’S MOTION FOR LEAVE TO FILE SUR-REPLY  
TO DEFENDANT OFFICE OF THE PUBLIC DEFENDER’S REPLY MEMORANDUM IN  
SUPPORT OF MOTION TO DISMISS

Plaintiff Jane Doe, by her undersigned counsel, hereby moves for leave to file her Sur-Reply to Defendant Office of the Public Defender’s Reply Memorandum in Support of Motion to Dismiss (“Reply Memorandum”). Defendant Office of the Public Defender (“OPD”) has raised new argument in its Reply Memorandum and has inserted inaccurate and unsupported statements of fact regarding Ms. Doe’s application for admission to the Maryland State Bar, the process for admission to the Maryland State Bar, and even OPD’s own conduct with respect thereto. Reply Memorandum, pp. 2-4.

Plaintiff will be prejudiced if those inaccurate statements go uncorrected. The proposed Sur-Reply is narrowly tailored to address the inaccurate statements of fact and misrepresentations about the Maryland bar admission process. It is filed promptly ensuring it will cause no delay in the Court’s consideration.

Accordingly, Plaintiff urges the Court to grant Plaintiff Leave to file her Sur-Reply to Defendant Office of the Public Defender’s Reply Memorandum and to grant such additional relief as it deems just. In the alternative, Plaintiff urges the Court to disregard or strike OPD’s new

allegations of fact and argument regarding the Maryland State Bar admission process and Plaintiff's application for admission, and grant such additional relief as it deems appropriate.

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